

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Ricardo Fuentes-Medrano

Principal

YOB: 1999

Mexico

AKA: Jose Martinez-Gonzales

Case Number:

M-18-1375-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 3, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ronald Ariel Baca-Castro and Annel Maudiel Gomez-Vega, both citizens and nationals of Honduras, along with six (6) other undocumented aliens, for a total of eight (8) who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near Mission, Texas to the point of arrest near Mission, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On July 3, 2018, a Border Patrol Agent operating a tower camera observed nine subjects walking north and making several stops attempting to conceal themselves in high grassy areas, in Mission, Texas. This area is well known for human and narcotic smuggling. The agent relayed the observations and Border Patrol Agents responded to the area. With the assistance of Customs and Border Protection Air Support, agents located nine subjects attempting to conceal themselves in a heavily brushed area. Agents determined all nine subjects were illegally present in the United States and did not possess any documents allowing them to remain in the United States legally.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on July 4, 2018.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Jon M. Chan

Signature of Complainant

Sworn to before me and subscribed in my presence,

Jon M. Chan

Senior Patrol Agent

Printed Name of Complainant

July 4, 2018 @ 2:47 p.m.

at McAllen, Texas

Date

City and State

Juan F. Alanis, U. S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-1375-M

RE: Ricardo Fuentes-Medrano

CONTINUATION:

During a field interview, Ricardo FUENTES-Medrano, was identified as the foot guide by one of the members of the group. All the subjects were placed under arrest and transported to the McAllen Border Patrol Station for processing.

Principal Statement:

Ricardo FUENTES-Medrano, a citizen of Mexico, was advised of his Miranda Rights, stated he understood his rights, and declined to answer questions without the presence of an attorney.

Material Witnesses Statements:

Ronald Ariel BACA-Castro and Annel Maudiel GOMEZ-Vega, both citizens of Honduras, were advised of their Miranda Rights, stated they understood their rights, and agreed to answer questions without the presence of an attorney.

Material Witness 1:

Ronald Ariel BACA-Castro claimed his father made his smuggling arrangements, paid 2,600 USD, and was to pay additional money once he arrived to Houston, Texas. BACA stated the foot guide instructed the group to board a raft, and after crossing the river, instructed the group to follow him. BACA indicated the foot guide was wearing a black shirt and black shoes. BACA identified Ricardo FUENTES-Medrano, through a photo lineup, as the foot guide of the group he was traveling with.

Material Witness 2:

Annel Maudiel GOMEZ-Vega claimed he made his arrangements to be smuggled into the United States and was going to pay 5,100 USD. GOMEZ crossed the river on a raft with the help of a foot guide. At the riverbank, the foot guide instructed GOMEZ to board a raft and told him to not be afraid. After crossing the river, the group followed the foot guide who instructed them to be attentive and look out for immigration. GOMEZ identified Ricardo FUENTES-Medrano, through a photo lineup, as the foot guide that smuggled him into the United States.